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September 5, 1992

TO: Mr. David Croxton
U.S. EPA., Region 10
1200 Sixth Ave., HW-106
Seattle, WA. 98101

FROM: Robert Farrell
Box 462, RFD 1
Augusta, Maine 04330

**ENFORCEMENT
SENSITIVE**

FILE COPY

Subject: July 30, 1992 Letter Responding to EPA Comments.

1) Based on the contouring that was done for the top of the silt layer included in the earlier review, the location of CP 117 would have been within the widest portion of the lowest contour line for the top of the silt surface. Reality is that relocating CP 115 to TB-3 is probably just as suitable a location as CP 117. The major difference between the two locations is that at TB-3 the elevation of the top of the silt surface is already known. Location CP 117 would have provided a new data point to better contour the silt surface and perhaps better predict the location of any DNAPL that might be present.

Other than the general feel that the location of CP 117 would have been a better location than TB 3 and obtaining a new data point where none previously existed, there does not appear to be a valid scientific reason for not accepting the proposed relocation of CP 115 to TB-3.

2) There is no apparent problem with the relocation of CP 122B further north, installing a piezometer at CP 112 in the upper aquifer, and installing a deep monitoring wells at CP 106. The only difficulty with what is proposed is the loss of CP 107B.

There are only a few wells within the deep aquifer at present. The proposal shown in figure C-1 calls for the addition of 3 deep aquifer wells distributed in a large triangle around the facility. Significant holes in the existing deep aquifer monitoring system would be filled with these deep wells. The lose of CP 107B leaves a large gap in west side between CP 104 B and CP 103B. Given the unknown flow directions in the lower aquifer, it is believed necessary to have a wells at CP 107B.

USEPA RCRA



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TO: Mr. David Croxton
U.S. EPA., Region 10
1200 Sixth Ave., HW-106
Seattle, WA. 98101

FROM: Robert Farrell
Box 462, RFD 1
Augusta, Maine 04330

Subject: Pier 91, Draft Letter of Augusta 27, 1992

MOD 1: Appears OK.

MOD 2: This is an area where contaminated soil is expected. The degree of contamination and the possible impact these contaminated soils may have has to be evaluated. Is there an alternative location close to the sump that is appropriate?

MOD 3: Appears OK.

MOD 4: The CP 114 location is an important location in defining the extent of contamination. Every effort should be made to retain CP 114, however, moving the location of CP 114 a distance of 20 to 40 feet should not effect the data that needs to be obtained at this location. Given the presense of the potentially contaminated underground utility vault, it seems that this should be investigated to determine if this is a potential source area for some contaminates detected on site.

MOD 5: The API separator was near this proposed location. This was the reason for selecting of this location to begin with. It seems the logic presented in selecting this location to begin with is still valid. Moving the proposed location of the well a few feet along the edge of the former API separator should not effect the results significantly, but moving the well away from the former API separator will effect the reasons for choosing this location to begin with.

MOD 6: Appear OK.